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VIA OVERNIGHT MAIL

September 28, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: **WC Docket 05-196**
Compliance Letter
LineSider Communications, Inc.

Dear Ms. Dortch:

Enclosed, please find an original and four copies of LineSider Communications, Inc.'s, Compliance Letter in the above captioned matter. If you have any questions regarding this material please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Matthew W. Collins", is written over the typed name.

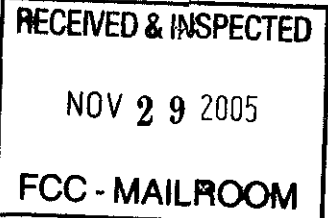
Matthew W. Collins
VP, Legal
LineSider Communications, Inc

CC: Kathy Berthot
Janice Myles
Best Copy and Printing

LineSider Communications, Inc., the Schrafft Center, 529 Main St, Charlestown, MA 02129

No. of Copies rec'd 0x4
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November 28, 2005



Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth St., SW
Washington, DC 20554

RE: WC Docket No. 05-196; Compliance Letter

Dear Ms. Dortch:

I am writing on behalf of LineSider Communications, Inc. ("LineSider"), a provider of managed Voice over Internet Protocol ("VoIP") and data services. The purpose of this letter is to provide a compliance report on the status of LineSider's implementation of E-911 service, as required by the First Report and Order in the above-captioned proceedings, FCC 05-116, 20 FCC Rcd 10245 (released June 3, 2005) ("*Order*"); Public Notice, "Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters", WC Docket Nos. 04-36, 05-196, DA 05-2945 (released Nov. 7, 2005) ("*Public Notice*"). This letter provides background information about LineSider, and then responds to each of the specific information requests outlined in the *Public Notice*.

Background on LineSider Communications

LineSider is a managed service provider offering managed Voice over Internet Protocol and data services to subscribers throughout the United States. LineSider does not maintain its own facilities for the provisioning of VoIP services, instead purchasing the VoIP product on a wholesale basis from New Global Telecom ("NGT").

The suite of products that LineSider purchases from NGT includes: (1) the hosted application server with comprehensive feature sets for residential and enterprise segments of the market; (2) nationwide origination and worldwide termination; (3) direct inward dialing ("DID") numbers; (4) local number portability; (5) Directory Assistance, Directory Listing, and TRS services; (6) audio and web conferencing, including on-demand multi-party voice conferencing with optional web meeting and document sharing; (7) cross-border number assignment; (8) integrated OSS and billing functionality; (9) customer premise equipment ("CPE") support; (10) and marketing and training support.

Prior to the effective date of the *Order*, LineSider, through the services of NGT has been providing its subscribers access to 911-type services. LineSider has provided notice of the limitations of its 911-type services to all of its subscribers, both new and existing, pursuant to ¶ 48 of the *Order*. At the time of LineSider's last report to the Commission, LineSider had received affirmative responses from 90% of its subscribers acknowledging the limitations of LineSider's 911 Service.

1. Description of LineSider's E-911 Solution.

NGT's SafeCall® E-911 Service" is the service that LineSider provides for its subscribers. NGT has contracted with Intrado to develop an E-911 solution to address the requirements of the Order. The SafeCall® service primarily utilizes Intrado's network capabilities, but will also utilize services provided by other Emergency Service Gateway Providers (ESGWs) to provide a compliant E-911 service for VoIP 911 calls. LineSider will be able to provide its subscribers with SafeCall® E-911 services to facilitate fully compliant E-911 connectivity to those PSAPs where LineSider, via its underlying providers, has the necessary access to the PSAPs. The Public Notice includes several bulletpoints specifying the information that VoIP providers must submit in their Compliance Letters. *Public Notice* at 3-4. The first of these bulletpoints requires information regarding the percentage of the provider's end-user subscribers to whom the provider is able to provide 911 services in compliance with the rules established in the *Order*. As of November 28, 2005, LineSider, based on incomplete information provided by its underlying provider, expects to have its fully compliant E-911 service available for approximately 45% of its current VoIP subscribers, a number that is expected to increase as more complete information is received from LineSider's underlying provider and as LineSider's underlying providers expand the service footprint by the end of 2005. Those subscribers who do not have access to E911 Service through NGT's SafeCall® Service, will have access to NGT's SafeCall® Operator Assisted 911 Service, as further described below. These numbers will be reduced as LineSider's underlying providers expands the geographic areas served by their E-911 services ("Coverage Area"), as noted below.

a. 911 Routing Information/Connectivity to Wireline E-911 Network.

The first sub-bullet under the first main bulletpoint in the *Public Notice* requires a statement as to whether the provider is transmitting 911 calls to the appropriate PSAP (or other appropriate destinations) using the Selective Router, the trunk lines between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary. LineSider, through its underlying providers will be able to provide its subscribers with E-911 services to facilitate fully compliant E-911 connectivity to those PSAPs where LineSider via its underlying providers has the necessary access to the PSAPs.

Based on the estimates provided by its underlying providers, LineSider expects that over 99% of the VoIP-originated 911 calls over the Service within the E-911 coverage area ("Coverage Area") will be transmitted via the appropriate Selective Routers and other components of the Wireline E-911 Network (the remaining VoIP-originated 911 calls are transmitted via the PSTN using the Operator Assisted 911 Service due to limitations in PSAP capabilities). The rate centers and MSA comprising the initial Coverage Area of the service provided to LineSider, as of November 28, 2005, are listed in Attachment A to this letter.

The *Public Notice* also directs providers to quantify the number of Selective Routers to which it has interconnected, directly or indirectly, as of November 28, 2005. As of that date, LineSider, through its underlying provider and that provider's relationships, is interconnected with 150 Selective Routers and 2500 PSAPs

b. Transmission of ANI and Registered Location Information.

The second sub-bullet point in the *Public Notice* requires detailed information on whether the provider is transmitting the 911 callers' ANI and Registered Locations to all answering points that are capable of receiving and processing this information. LineSider and its underlying provider are making the utmost effort to obtain and validate Registered Locations for every existing LineSider end-user VoIP subscriber. As required by the *Order*, all 911 calls from those subscribers will then be routed either via Selective Routers over dedicated lines or via the PSTN directly (for those PSAPs not utilizing 911 Selective Routers) to the appropriate PSAP for the subscriber's Registered Location along with the call-back number and location information (to the extent that the PSAP is capable of receiving and utilizing location information). LineSider's efforts to obtain Registered Location information are discussed below.

The second sub-bullet also requested the following: (i) the percentage of PSAPs capable of receiving and processing ANI and Registered Location information; (ii) the percentage of end-user subscribers whose ANI and Registered Location are being transmitted when they place E-911 calls; and (iii) an explanation of why the provider is not transmitting the 911 caller's ANI and Registered Location to all PSAPs that are capable of receiving and utilizing location information, to the extent it is not able to do so. In response, LineSider submits as follows:

- Item (i): LineSider respectfully submits that it lacks the information needed to respond because, as noted above, LineSider depends on NGT who in turn depends on Intrado and other ESGWs for connectivity to Selective Routers, and does not have direct information regarding the percentage of PSAPs that are capable of receiving and processing ANI and Registered Location information.
- Item (ii): LineSider respectfully submits that it lacks the information needed to respond because LineSider depends on NGT who in turn depends on Intrado and other ESGWs for connectivity to Selective Routers, and does not have direct information regarding the percentage of PSAPs that are capable of receiving and processing ANI and Registered Location information. However, as stated above, as of November 28, 2005, LineSider, based on information provided by its underlying provider, expects to have fully compliant E-911 service available for approximately 45% of its current VoIP subscribers and LineSider, based on estimates provided by its underlying provider, expects that over 99% of the VoIP-originated 911 calls over LineSider's E-911 Service within the Coverage Area are transmitted via the appropriate Selective Routers and other components of the Wireline E-911 Network (the remaining

VoIP-originated 911 calls are transmitted via the PSTN using Operator Assisted 911 Service due to limitations in PSAP capabilities).

Item (iii): As of November 28, 2005, LineSider understands, based on information provided by its underlying provider, that SafeCall[®] E-911 Service is transmitting the 911 caller's ANI and Registered Location to all PSAPs in its Coverage Area that are capable of receiving and utilizing location information.

c. 911 Coverage.

The third sub-bullet in the *Public Notice* requires the submission of information regarding the areas in which the provider is in full compliance with the *Order* and where it is not, as well as its plans for coming into full compliance, including its anticipated timeframes.

As of November 28, 2005, LineSider, through its underlying providers is able to provide fully-compliant E-911 Service in 2,081 rate centers in 31 markets. The specific rate centers are listed in Attachment A to this letter. This converts into being interconnected to 150 Selective Routers and 2500 PSAPs, most of which are capable of receiving ANI and Registered Location information. By January 2006, LineSider's underlying provider expects to be interconnected to an additional 30 Selective Routers and 1000 PSAPs for an additional 1,781 rate centers in 20 additional markets. By March 2006, this coverage is expected to increase to a total of 250 Selective Routers and 4000 PSAPs, and 400 Selective Routers by June 2006. In terms of population, LineSider, underlying providers predicts that they will be able to make available fully compliant E-911 Service in areas covering 60% of the population as of November 28, 2005. The remaining coverage area is being prioritized with the expected roll-out to 70% coverage of the domestic US population by end of the year and between 80-85% coverage by the end of June 2006. ^{1/} The remaining 15% are locations where the PSAPs either do not support E-911 (5%), making the service described above unavailable in these locations (LineSider, through its underlying providers, will support basic or other 911 processes that these locations offer) or are in areas currently not scheduled for E-911 coverage until after June, 2006 and where LineSider will not provide VoIP services until such E-911 coverage is available.

LineSider continues to work with its underlying provider who in turn is working with Intrado to increase the coverage area for E-911 services. Intrado has released information that it has contracted with Qwest, SBC, and Verizon, and other ESGW providers to enhance its own coverage. LineSider is also independently working with other carriers to provide additional coverage independent of its current providers.

2. Obtaining Initial Registered Location Information.

^{1/} A detailed schedule of the planned roll-out of SafeCall[®] E-911 Service is provided in Attachment B.

The second main bullet point in the *Public Notice* requests detailed information on actions the provider has taken to obtain existing subscribers' current Registered Location and new subscribers' initial Registered Location, including dates, methods of contact, and percentages of subscribers from whom such information has been obtained. Since the issuance of the Order, LineSider has worked to ensure that it has Registered Location information for all of its existing and new subscribers. LineSider has instituted corporate policy that requires that for any new subscriber, valid Registered Location information be provided prior to institution of service to that subscriber. In addition LineSider sent email communications to all of its subscribers on September 30, 2005 informing them of the need to provide registered address information. On October 3, 2005 a follow-up email was sent to all subscribers providing them with a template to provide this information to LineSider. On October 11, 2005 yet another follow-up email was sent to subscribers who had not furnished the required information to LineSider. LineSider also enlisted the assistance of its technical services team to make follow-up phone calls between October 11 and November 23, 2005. As of November 28, 2005 LineSider, has obtained registered addresses from approximately 81% of its current subscribers.

3. Obtaining Updated Registered Location Information.

The third main bullet point requires information on methods by which end-user subscribers can update their Registered Locations. The SafeCall® E-911 Service that LineSider will be offering enables LineSider's end-user subscribers to dial an 800 number into a call center in order to update their Registered Location to a valid postal address within the Coverage Area. LineSider's underlying provider expects to offer this nomadic update capability via a web portal in the first quarter of 2006. If an updated Registered Location is within the coverage area for SafeCall® E-911, the subscriber will be notified in real time in most instances that the Registered Location was updated and validated and the subscriber will have VoIP service at this location, including fully compliant E-911 Service. In the event that the subscriber attempts to update the Registered Location to a location that is outside of the Coverage Area for SafeCall® E-911 Service, the subscriber will be notified in real time in most instances that VoIP service is unavailable at that location and service will be suspended (although an alternative form of 911 service, described below, will continue to be available) and will be reinstated when the address is subsequently updated back to a Registered Location within the coverage area for SafeCall® E911. ^{2/}

4. Technical Solution for Nomadic Subscribers.

The fourth bullet in the *Public Notice* seeks a detailed description of the provider's technical solutions to ensure that subscribers have access to 911 service whenever they use their service nomadically. As noted above, the end-user subscribers to LineSider's service have the

^{2/} LineSider's underlying provider has provided its subscribers and their subscribers with a means to check the availability of VoIP Services and SafeCall® E-911. A subscriber will be able to check an address prior to updating the Registered Location to validate the availability of Voice Services.

ability to update their Registered Locations, and if they provide new Registered Locations within the Coverage Area for the SafeCall® E-911 Service, they will have access to E-911 functionality that is fully compliant with the *Order*. However, if end-user subscribers update their Registered Locations to domestic U.S. locations outside the Coverage Area, LineSider will suspend Voice Services, but an alternative form of 911 service is available. LineSider's underlying provider has developed the capability and will provide (on an interim basis and only until E-911 is fully implemented in those areas) an emergency operator-assisted 911 service – known as SafeCall® Operator Assisted 911 Service – in which 911 calls include the call-back number and the actual Registered Location that a subscriber has provided.^{3/} Specifically, 911 calls placed by subscribers with Registered Locations within the United States, but outside the geographic area where LineSider's underlying provider has deployed fully-compliant E-911 service, would be routed to an emergency call response center ("ECRC"). The ECRC would have operators standing by 7 days a week, 24 hours a day, with access to the subscriber's Registered Location and call back number. The ECRC would then provide a "soft transfer" of the 911 call to the appropriate 911 dispatcher or, potentially, to a local exchange telephone line of the geographically appropriate PSAP. The ECRC could then communicate the Registered Location and call back number prior to transferring the actual call, in case the caller cannot. LineSider will send notifications to its subscribers that have Registered Locations outside of the Initial E-911 Coverage Area and have SafeCall® Operator Assisted 911 Service.

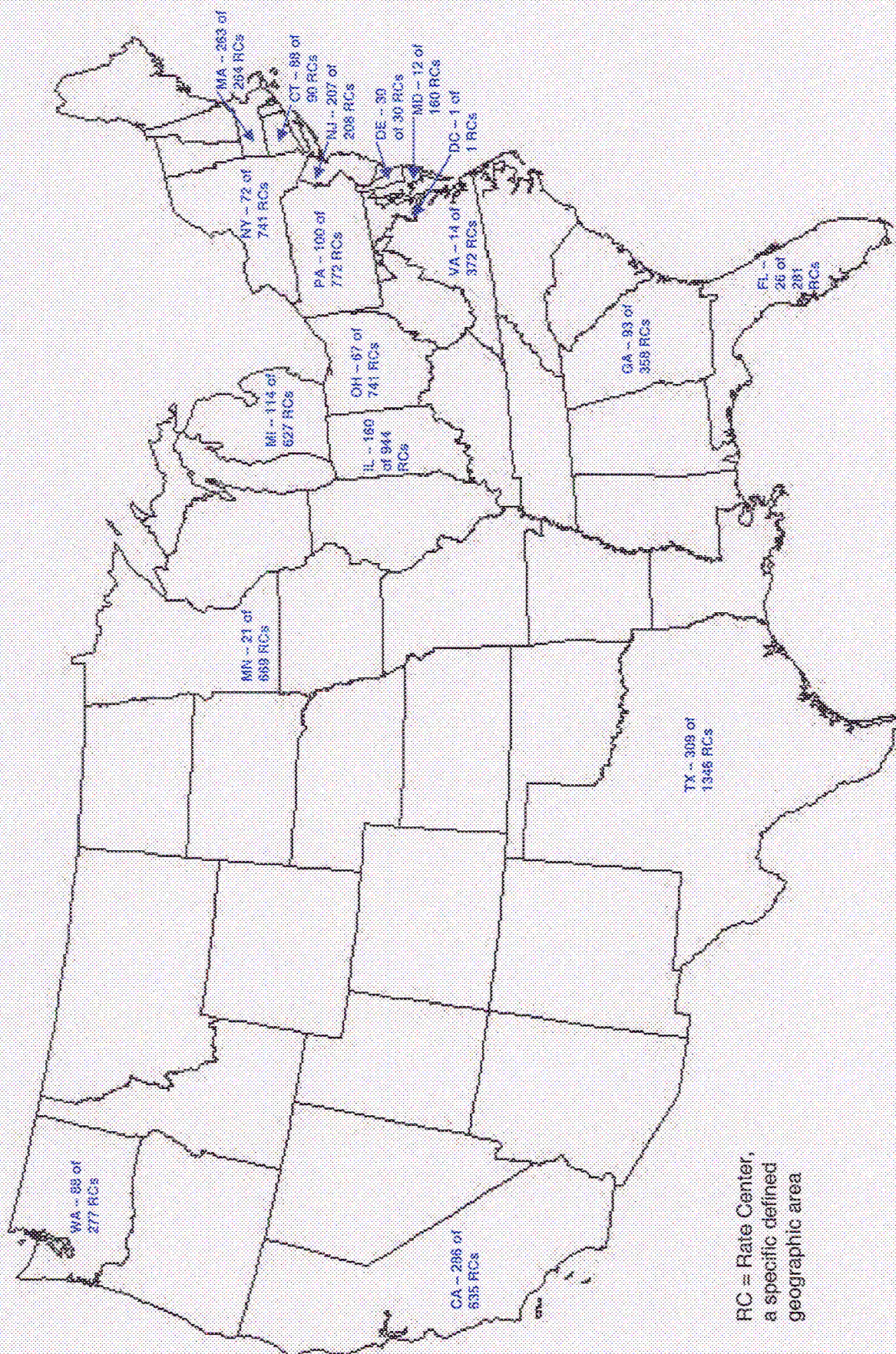
Additional Information Regarding LineSider's Compliance Plan.

As required by the *Order*, prior to November 28, 2005 LineSider plans to stop making available Voice Services to *new* end-user subscribers in areas outside the Coverage Area in which LineSider, through its underlying provider is able to provide fully compliant E-911 services. LineSider will however, continue providing service to *pre-existing* end-user subscribers with initial Registered Locations outside of the Initial E-911 Coverage Area. LineSider will grandfather only these existing subscribers in these specific locations so that they can continue to use the Voice Services from their initial registered location while LineSider's underlying provider works to expand SafeCall® E-911 coverage into these areas. For these existing subscribers, LineSider, through its underlying provider will provide SafeCall® Operator Assisted 911 Service for the initial Registered Location that is outside of the initial E-911 Coverage Area. This operator-assisted 911 service, while not equivalent to fully-compliant E-911 service, is a far better approach for subscribers than simply cutting off VoIP service, sending a call to the correct PSAP without Registered Location information or routing 911 calls to the wrong PSAP.

Conclusion.

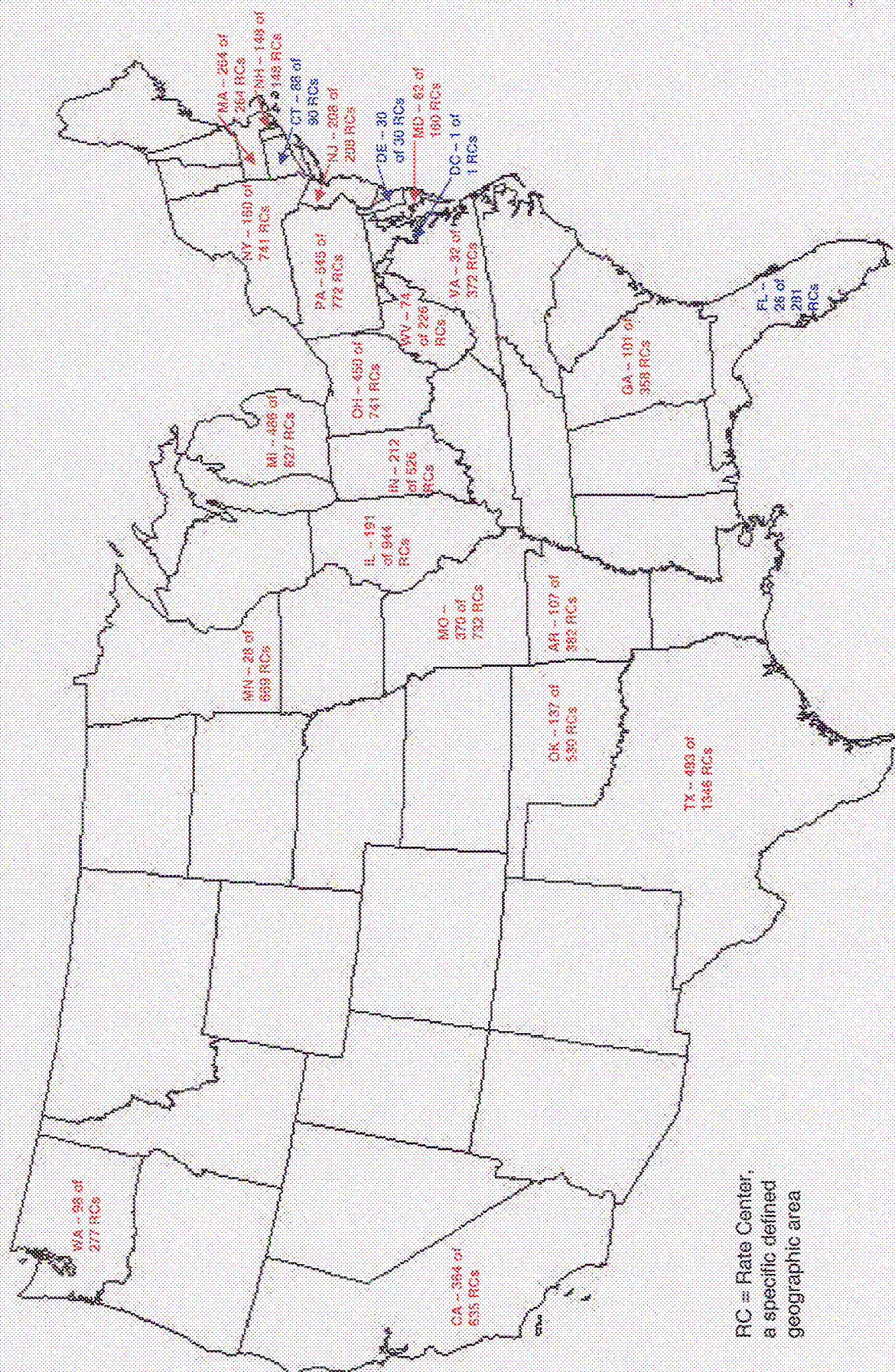
^{3/} SafeCall Operator Assisted will also be utilized initially when a PSAP does not utilize Selective Routers and other components of the Wireline E-911 Network.

Attachment A SafeCall 911 Coverage Information as of November 28th, 2005



RC = Rate Center,
a specific defined
geographic area

SafeCall 911 Coverage Information as of December 31st, 2005



Appendix B for SafeCall coverage as of November 28th, and planned expansion in 2006.

NC-05	Dec-05	Q1-06	Q2-06	Q3-06
New York, NY	Denver, CO	Rochester, NY	Louisville, KY	Honolulu, HI
Los Angeles-Long Beach, CA	Pittsburgh, PA	Omaha, NE	Charleston-North Charleston, SC	San Juan, PR
Orange County, CA	Scranton-Wilkes-Barre, PA	Nassau-Suffolk, NY	McAllen-Edinburgh-Mission, TX	
San Francisco, CA	Providence-Fall River-Warwick, RI	Albany-Schenectady-Troy, NY	El Paso, TX	
San Jose, CA	San Antonio, TX	Buffalo-Niagara Falls, NY	Milwaukee-Waukesha, WI	
Hartford, CT	Austin-San Marcos, TX	Syracuse, NY	Wichita, KS	
New Haven-Meriden, CT	Birmingham, AL	Harrisburg-Lebanon-Carlisle, PA		
Washington, DC	Mobile, AL	Norfolk-Virginia Beach, VA		
Wilmington-Newark, DE	Phoenix-Mesa, AZ	Richmond-Petersburg, VA		
Chicago, IL	Tucson, AZ	Indianapolis, IN		
Boston, MA	Tampa-St. Petersburg, FL			
Springfield, MA	Orlando, FL			
Newark, NJ	Jacksonville, FL			
Bergen-Passaic, NJ	Sarasota-Bradenton, FL			
Jersey City, NJ	Gary, IN			
Monmouth-Ocean, NJ	Grand Rapids-Muskegon, MI			
Philadelphia, PA	Charlotte-Gastonia-Rock Hill, NC			
Allentown-Bethlehem-Easton, PA	Greensboro-Winston-Salem, NC			
Houston, TX	Raleigh-Durham-Chapel Hill, NC			
Dallas, TX	Albuquerque, NM			
Miami, FL	Las Vegas, NV			
Fort Lauderdale, FL	Cincinnati, OH			
West Palm Beach-Boca Raton, FL	Columbus, OH			
Atlanta, GA	Dayton-Springfield, OH			
Detroit, MI	Toledo, OH			
Ann Arbor, MI	Youngstown-Warren, OH			
Minneapolis-St. Paul, MN	Akron, OH			
Cleveland-Lorain-Elyria, OH	Portland, OR			
Seattle-Bellevue-Everett, WA	Nashville, TN			
Tacoma, WA	Memphis, TN			
Riverside-San Bernardino, CA	Knoxville, TN			
	Salt Lake City-Ogden, UT			
	Little Rock-North Little Rock, AR			
	New Orleans, LA			
	Baton Rouge, LA			
	St. Louis, MO			
	Kansas City, MO			
	Tulsa, OK			
	Oklahoma City, OK			
	Greenville-Spartanburg, SC			
	Columbia, SC			
	Oakland, CA			
	Ventura, CA			
	San Diego, CA			
	Sacramento, CA			
	Bakersfield, CA			
	Stockton-Lodi, CA			
	Fresno, CA			
	Baltimore, MD			
	Middlesex-Somerset, NJ			
	Fort Worth-Arlington, TX			